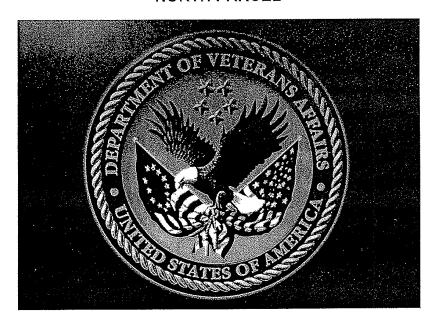


FINDING OF SUITABILITY FOR TRANSFER (FOST) FINAL REPORT

for the

VETERANS AFFAIRS MEDICAL CENTER GULFPORT, MISSISSIPPI NORTH PARCEL



September 29, 2008

Prepared for:

The United States Department of Veterans Affairs

Prepared by:

Potts Environmental Management & Consulting Company, LLC 13952 Arbor Circle, Omaha, NE 68144 (402) 333-3240





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EXECUTIVE SUMMARY

The Veterans Affairs Medical Center (VAMC) located at 200 East Beach Boulevard, Gulfport, Harrison County, Mississippi property intends to transfer the property from the United States Department of Veteran Affairs (VA) to the City of Gulfport, Mississippi. The property has approximately 86 acres in two (2) parcels separated by Railroad Avenue. This Finding of Suitability for Transfer (FOST) Report is for the north parcel, north of Railroad Avenue, approximately 37.9 acres. The Draft FOST indicated the property required action prior to transfer. The VA will supply the City of Gulfport documentation of completion for the items listed in following sections.

The future use of the property by the City of Gulfport has not been provided to the VA or its contractors. Therefore remediation levels were based on the Mississippi Department of Environmental Quality (MDEQ) Brownfields Target Remediation Goals for non-residential unrestricted use. This FOST Report has been prepared based on the review of the references noted, an on-site review on August 11, 12, 2008 by a PEMC Co., LLC environmental professional, and communication with the VA Facilities Engineer regarding the completion of environmental remedial actions.

The VAMC commitments for remedial action will be documented and the reports of completions supplied to the City of Gulfport. Upon completion of the VAMC commitments specified in this Draft FOST Report, the facility north parcel will be suitable for transfer. This Final FOST Report is predicated on the completion of these commitments and documentation provided.



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1.0 INTRODUCTION

The United States (U.S.) Department of Veteran Affairs (VA) has entered into an agreement to transfer the Veterans Affairs Medical Center (VAMC) to the City of Gulfport, Mississippi. The facility to be transferred comprises of two (2) parcels of property separated by East Railroad Street. This Finding of Suitability for Transfer (FOST) is for the north parcel. A Drawing of the VAMC Gulfport, Mississippi, Building Schedule is presented in Attachment 1.

The environmental issues have been identified and have been summarized below. The environmental conditions have been remediated or the mitigation of the environmental condition has occurred prior to transfer. Mitigation may include complete remediation of the environmental condition, remediation to below the EPA Brownfields action levels, or transfer with condition identified and no expected harm to human health or the environment was identified.

2.0 LOCATION AND LEGAL DESCRIPTION

The VAMC, Gulfport is located along East Beach Road (U.S. Highway 90), approximately three (3) miles east of U.S. Highway 49. The southern end of the main facility borders U.S. Highway 90 which is in an east-west highway along the Gulf of Mexico coast line. The VAMC facility is split into two (2) parcels, a south parcel consisting of approximately 48.06 acres, and a north parcel consisting of 37.9 acres. This FOST has been prepared specifically for the north parcel only.

The VAMC north parcel is located north of Railroad Street and the Louisiana and Nashville Railroad line, which boarders the south end of the parcel. The entrances onto the north parcel are along the south end off East Railroad Street. One drive way along the west side of the property which goes from the south end to the north end, one entrance on the west side of the laundry building and boiler plant (Buildings 244 and 245), and one truck entrance on the east side, dock entrance of Building 244. The two (2) ponds are located at the northern end of the parcel.

The legal description shows the north parcel to line in parts of the; South ½ of the Southwest ¼ of the Southwest ¼ of Section 36, Township 7 South, Range 11 West, and the West ½ of Irregular Section 1, Township 8 South, Range 11 West, of the City of Gulfport 1st Judicial District, Harrison County, Mississippi. The legal description, detailed survey and the plot of the north parcel is presented in Attachment 1.



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3.0 BACKGROUND

The VAMC was originally occupied by the Mississippi Gulf Coast Exhibition and converted to a Naval Training Base in 1917. In 1919 the property was developed into a veterans Hospital. The date of construction of each individual building is not known from the information reviewed.

The north parcel had 14 buildings/structures, one electrical substation, and two (2) ponds. The electrical substation is located along the fence line on the west end of the property at the approximate center (north to south). The buildings and corresponding building numbers are listed below:

BUILDING No. 67 68 107 202 214 216	BUILDING DESIGNATION Siphon Chamber Sedimentation Chamber Staff Quarters (recreational area) Bus Stop Shelter Recreation Shelter Emergency Electrical System (trailer and switch trailer
244 245	Laundry Building Boiler Plant
246	Pavilion (recreational area)
247	Pavilion (recreational area)
248	Barbeque Pit (recreational area)
611	Engineering Storage
613	Garage-one car (recreational area)
639	Underpass/Utilities

On August 17, 1969 Hurricane Camille came ashore along the gulf coast of Mississippi. The debris from the destroyed buildings and road ways was disposed of in pond #3, the smaller of the two ponds. On August 29, 2005 Hurricane Katrina hit the Mississippi gulf coast. The coastal flooding reached storm surge heights of 25-28 feet above normal tide level. The VAMC buildings were severely damaged and the facility did not reopen. The Federal Emergency Management Agency (FEMA) used the northern parcel to setup temporary trailers to house people displaced and homeless as a result of Hurricane Katrina. The trailer facility had utilities installed including City water, sanitary sewer hook-ups, electrical, satellite dish hook-ups, and solid waste dumpsters. As of the date of this report, the trailers were removed but the trailer utilities remained in the ground and some dumpsters remained. One trailer for the grounds keeper was still in place.



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4.0 CITY OF GULFPORT REUSE PLAN

The City of Gulfport has not informed the VA of the redevelopment plans for the facility north parcel.

5.0 ENVIRONMENTAL CONDITIONS

5.1 Solid Waste

Solid waste issues were identified in two categories, the demolition/concrete/asphalt debris in Pond #3 at the north end, and the second is the solid waste collection containers installed by FEMA for collection and disposal of solid waste from the trailer occupants. The location of Pond #3 is illustrated on the OHC Environmental Engineering Sample Location Map presented in Attachment 2.

5.1.1 Pond #3 Solid Waste/Hurricane Camille Debris

Pond #3 located at the north end of the parcel was used for disposal of debris as a result of Hurricane Camille. The pond is roughly 200 feet long (east to west) and ranges from 100 feet wide on the west side to 140 feet wide on the east end. The depth of the pond is uncertain, however one boring (DP-34) drilled during the OHC Environmental Engineering, Inc., Soil and Groundwater Sampling Report—Part II, November 13, 2007 showed rubble down to depths of 6-feet with sands below. OHC further defined the pond using ground penetrating radar (GPR). The GPR indicated that debris exists from approximately 2.5-feet to 5.0-feet below the ground surface. The type of rubble material was not specified. No hazardous containers, discolored soil, odors, or high field screening readings were noted which may have indicated hazardous materials disposal. For the purposes of mitigation and this FOST report, the materials in Pond #3 are considered non-hazardous solid waste such as construction materials, concrete, asphalt, bricks, metals, plastics, and other miscellaneous solid wastes. The debris material deposited is considered to have originated from the VAMC with no off-site debris material disposed in Pond #3.

Soil

Soil samples collected by OHC indicated concentrations of Acetone and Methyl-ethyl-ketone (MEK also known as 2-butanone). The concentrations were below the Brownfields Target Remediation Goals (TRGs). Fourteen (14) Poly Aromatic Hydrocarbons (PAHs) compounds were detected in the soil. Eight (8) of the compounds were below the TRGs. Six (6) compounds exceeding the TRGs included; benzo(a)anthracene, chrysene, benzo(b)flouranthene, dibenzo(a,h)anthracene, and indeno(1,2,3,-cd) pyrene. These compounds are associated with petroleum based oils.



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Groundwater:

The groundwater was sampled below the pond from DP-34 which was encountered at approximately 6.7-feet below ground surface. The groundwater samples indicated no detection of any analyte including benzene, toluene, ethylbenzene, xylenes (BTEX), PAHs which are petroleum compounds, organochlorine pesticides, metals, and chlorinated and non-chlorinated volatile organics.

Due to the lack of petroleum based hydrocarbons in the groundwater, the PAHs detected in the soil appear to be held-up in the upper surface soil.

VAMC Commitments Prior to Transfer:

The VAMC will conduct the remedial action in Pond #3 that is presented in the agreement between the City of Gulfport and the VA. A competent environmental professional should be on-site during the pond remedial action to record the activities and collected the confirmation samples. Documentation of completion of this remedial action will be submitted to the City of Gulfport.

Restrictions:

There will be no restrictions from this environmental condition after mitigation has been completed.

Future Commitments:

Institutional controls may need to be placed on the future use of the pond area as a result of this environmental condition.

5.1.2 FEMA Solid Waste

FEMA responded to the devastation of Hurricane Katrina by establishing a trailer park as temporary housing on the north parcel of the VAMC. The FEMA Project Manager/Caretaker trailer is the only trailer unit left on site. FEMA installed all necessary utilities including solid waste containers for trash removal. These containers and miscellaneous trash in the trailer park area should be removed by FEMA in order to remove the potential for improper materials disposal.

VAMC Commitments Prior to Transfer:

The VAMC will coordinate with FEMA Project Managers to remove the remaining solid waste containers and debris.

Restrictions:

There are no restrictions from this environmental condition.

Future Commitments:

There are not future commitments as a result of this environmental condition.



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5.2 Underground Storage Tanks

The VAMC has two (2) underground storage tanks (USTs) located on the south-central part of the parcel and west of the existing Building 244. These tanks were associated with the boiler building, Building 245, which has been demolished and removed from the site. The USTs include a 20,000-gallon and 1,000-gallon steel tanks containing fuel oil for the boilers in the former Building 245. The USTs are currently in place and are schedule to be removed prior to the transfer of the property. A drawing of the Boiler Plant Building and UST locations is presented in Attachment 3.

OHC drilled one direct push boring in the area of the USTs, DP-29. Soil and groundwater samples were collected from this boring and the results are presented below.

Soil:

The soil sample from DP-29 at the southwest end of the UST locations indicated no detection of the petroleum compounds; benzene, toluene, ethylbenzene, xylenes (BTEX), diesel range organics (DROs), and PAHs.

Groundwater:

The groundwater sample collected from DP-29 indicated no detection of petroleum hydrocarbons including BTEX, DROs and PAHs. The laboratory results for the eight Resource Conservation and Recovery Act (RCRA) indicated that only lead (Pb) was detected above the regulatory TRG.

As a result of the soil and groundwater sample analysis from DP-29, the UST removal and closure sample analysis is not expected to provide any indication of soil or groundwater contamination.

VAMC Commitments Prior to Transfer:

The VA has committed to removing the USTs a part of the transfer of the property to the City of Gulfport. The USTs and all associated piping should be removed in accordance with MDEQ regulations and the proper closure sampling will be conducted. Documentation of the closure will be provided to the City of Gulfport.

Restrictions:

There are not current restrictions as a result of this environmental condition. If the UST removal sampling does not indicate a clean site, the City of Gulfport will be required to allow the VA to conduct the required investigation or remediation.

Future Commitments:

There are no current future commitments as a result of the USTs. However, the final future commitments will be dependent on the UST closure sampling and MDEQ responses.





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5.3 Polychlorinated Biphenyls

5.3.1 Fluorescent Light Ballasts

Building 245 has been demolished and therefore no fluorescent lights remain.

A PEMC Co. representative conducted a site reconnaissance of Building 244. Building 244 has been cleared of all utilities, except for storm drainage, and sanitary sewer line piping. No lighting or other electrical equipment remains in the building.

Commitments Prior to Transfer:

There are no commitments prior to transfer from this environmental condition. The condition has been abated and does not exist.

Restrictions:

There are no restrictions as a result of this environmental condition.

Future Commitments:

There are no future commitments from this environmental condition.

5.3.2 Transformers

Pad mounted transformers were located in three (3) locations of the VAMC north parcel, and one substation. The transformers were located at the northeast corner of former Building 107, on the southwest side of the former Building 245, and on the southwest side of Building 244. All three transformers have been removed. The pad mounted transformers and sub station locations can be found on the VAMC Electrical Utility Plan drawing presented in Attachment 4.

The electrical sub-station located on the west end of the parcel, midway from north to south. All equipment has been removed from the sub-station area.

Commitments Prior to Transfer:

There are no commitments prior to transfer from this environmental condition.

Restrictions

There are no restrictions as a result of this environmental condition.

Future Commitments:

There are no future commitments from this environmental condition.



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5.4 Asbestos

5.4.1 Building 245

An asbestos survey was conducted in former Building 245 prior to demolition. The building has been demolished and all materials have been removed from the site.

VAMC Commitments:

There are no commitments from this environmental condition.

Restrictions

There are no restrictions as a result of an asbestos environmental condition.

Future Commitments:

There are no future commitments from this environmental condition.

5.4.2 Building 244

An asbestos survey was conducted on selected materials in Building 244 by AMI Environmental, Inc. The only asbestos identified was in heating, ventilation, air conditioning (HVAC) red duct sealant in the offices at the northwest corner of the building. This material has been removed from the building. The AMI Environmental, Inc. Table 1 – Asbestos Survey is presented in Attachment 5.

A PEMC Co., LLC representative conducted a visual review of the building and found no HVAC equipment, duct work, or insulation in the building.

VAMC Commitments:

There are no commitments from this environmental condition.

Restrictions:

There are no restrictions as a result of an asbestos environmental condition.

Future Commitments:

There are no future commitments from this environmental condition.

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5.5 Lead Based Paint

5.5.1 Lead Based Paint in Building Materials

A lead based paint survey was conducted on the building materials and the soil surrounding the building. AMI Environmental, Inc. conducted the survey at Building 244 and found lead in several building materials. The building materials found with lead based paint included; the orange steel water valve at the southeast end of the dock area, the white exterior steel hand rail, the white metal upper panels on the exterior of the building, the brown metal exterior bookend panels, the main floor sink inside the building, and the main floor orange sprinkler line. Each of these painted surfaces exceeded the 1.0 mg/cm² lead content. The AMI Environmental, Inc. Table 2 – Lead Based Paint Survey is presented in Attachment 5.

Mitigation of the lead based paint has occurred on the interior main floor sink and the main floor sprinkler line. These components have been removed from the building. Mitigation of the hand rails was completed by removing the paint from the hand rails. The lead based paint on the exterior metal building components, and the orange aboveground water valve was observed to remain.

VAMC Commitments:

The removal of the lead based paint from the exterior building components will not be complete for the transfer. The VA therefore commits that these metal building materials will be in a condition that is safe for human health. Documentation of any remedial action will be provided by the VA to the City of Gulfport.

Restrictions

The upper exterior panels will require inspection and maintenance. Peeling paint from these panels will require removal in accordance with lead based paint remediation guidelines. The paint on the water main valve will require inspection and maintenance of the paint or paint removal.

Future Commitments:

The upper exterior panels will required periodic inspection for paint peeling and mitigate peeling paint.

5.5.2 Lead in Soil

AMI Environmental, Inc. collected seven (7) soil samples for lead analysis. Three (3) soil samples exceeded the laboratory method detection limit. All samples were below the 400 mg/Kg Brownfields TRG for unrestricted lead concentration in soil.





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VAMC Commitments:

There are no commitments from this environmental condition, lead in soil.

Restrictions

There are no restrictions as a result of this environmental condition.

Future Commitments:

There are no future commitments from this environmental condition.

6.0 CONCLUSIONS

The VA intends to transfer the VAMC in Gulfport, Mississippi to the City of Gulfport. This FOST Report was prepared for the north parcel only, the portion of the property north of Railroad Street. The FOST Report identified environmental conditions, the redial action/mitigation to be conducted and the final documentation to be submitted to the City of Gulfport.

The future use of the property has not been revealed by the City of Gulfport to the VA. Therefore, the environmental remediation/mitigation goals applied were the MDEQ Brownfields Tier 1 Target Remediation Goals for Unrestricted Non-Residential use.

The FOST Report has adequately identified the environmental conditions on the property based on the current conditions, past use, and documentation available identifying environmental conditions. Upon completion of the VAMC commitments and the subject to the restrictions and future commitments identified in this FOST Report, the property does not pose a threat to human health or the environment. The VAMC north parcel property will be suitable for transfer after completion of the VAMC Commitments of the environmental conditions identified in this Draft FOST Report.



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FOST Report for North Parcel of Property-Final

VA Medical Center, Gulfport, MS	September 29, 2008				
Prepared by:					
Keith J. Potts, P.G. Principal/Hydrogeologist PEMC Co., LLC					
Concurred by:					
VA Authorized Representative Signature, Title					
VA Authorized Representative, Title (Print)					



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REFERENCES

Phase I Environmental Site Assessment Revised, VA Gulfcoast Veterans Health Care System, 200 East Beach Boulevard, Gulfport, Mississippi 39507, OHC Environmental Engineering, June 7, 2007.

Soil and Groundwater Sampling Report, V.A. Gulfcoast Veterans Health Care System, 200 East Beach Boulevard, Gulfport, Mississippi, OHC Environmental Engineering, May 14, 2007.

Soil and Groundwater Sampling Report – Part II, V.A. Gulfcoast Veterans Health Care System, 200 East Beach Boulevard, Gulfport, Mississippi, OHC Environmental Engineering, November 13, 2007.

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Soil and Groundwater Sampling Report – Part IV, V.A. Gulfcoast Veterans Health Care System, 200 East Beach Boulevard, Gulfport, Mississippi, OHC Environmental Engineering, June 2, 2008.

Interim Assessment Report, V.A. Medical Center, 200 East Beach Boulevard, Gulfport, Mississippi, OHC Environmental Engineering, October 24, 2007.

V.A. CAMPUS NORTH OF RAILROAD AVENUE, CITY OF GULFPORT Drawing, Department of Veterans Affairs, BR-M Corporation LLC Professional Land Surveyors, January 22, 2007

Electrical Utility Plan Drawing, Underground and Aerial Electrical Utilities, Veterans Administration, Gulfport VAMC, Gulfport, Mississippi, Form 08-6231, October 1978.

SITE PLAN Drawing, NEW BOILER PLANT BUILDING 245, VAMC Biloxi, Mississippi, Gulfport Division, Veterans Administration, Rutledge and Associates, Inc., August 26, 1983.

Asbestos and Lead XRF Results, Updated Survey Report, Asbestos – Site Investigation Report, pages 38-39, TABLE 1.0 – Asbestos Material Sampling, Gulfport VA Medical Campus, - Gulfport, MS, AMI Environmental, Inc., April 2008.

Asbestos and Lead XRF Results, Updated Survey Report, Lead – Site Investigation Report, pages 41-42, TABLE 2.0 – Lead Based Paint, Lead Containing Paint and Materials, Gulfport VA Medical Campus – Gulfport, MS, AMI Environmental, Inc., April 2008.



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Laboratory Analysis Sheet, Lead in Soils by Flame AAS, EMSL Analytical Laboratory, May 1, 2008.

Hurricane History Information, Hurricane Camille and Hurricane Katrina, NOAA Coastal Services Center, On-line.

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ATTACHMENT 1

VA MEDICAL CENTER Building Schedule Drawing

PROPERTY DESCRIPTION: (DESCRIPTION OF VA.PROPERTY, GULFPORT, MISSISSIPPI DECEMBER 6, 1963) AS PER RECORD:

PROPERTY DESCRIPTION. (DESCRIPTION OF VA. PROPERTY, GULEPORT, MISSISSIPPI DECEMBER 6, 1983) AS PER RECORD.

BEGINNING AT THE SOUTHWEST CORNER OF SECTION 36, TOWNSHIP 7 SOUTH, RANGE 11 WEST, AND RUNNING THENCE MORTH ALONG THE WEST LINE OF SAID SCOTION 3. DISTANCE OF 2,748.5 FEET TO THE SOUTHERN BOUNDARY UND TO THE PASS CHISTIERS OF THE MEMORY OF THE PASS CHISTIERS OF THE MEMORY OF THE PASS CHISTIERS OF SHORT OF THE MEMORY OF THE PASS CHISTIERS OF THE PASS CHISTIERS OF THE MEMORY OF THE PASS CHISTIERS OF SAID SCOTION 1. STATE OF THE SOUTH LINE OF SAID SCOTION 1. TOWNSHIP 7 SOUTH, RANGE 11 WEST 3,051,3 FEET TO THE SOUTH LINE OF SAID SCOTION 1. TOWNSHIP 8 SOUTH LINE OF SAID SCOTION 1. TOWNSHIP SOUTH LINE OF SAID SCOTION 3. TOWNSHIP 7. SOUTH LINE OF SAID SCOTION 3. TOWNSHIP 7. SOUTH LINE OF SAID SCOTION 3. SOUTH SAID SCOTION 3.

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THE RIGHT OF WAY AND PROPERTY OF THE GUI-PORT AND MISSISSIPPI COAST TRACTION COMPANY AND OF THE LOUISVILLE AND MASHVILLE RAILROAD IS EXCLUDED FROM THE ABOVE DESCRIPTION, IT BEING THE PURPOSE AND INTENT OF THIS DEED TO CONVEY ONLY THE PROPERTY OWNED BY THE STATE OF MISSISSIPPI AND THE CITY OF GUI-PORT.

WITNESS OUR SIGNATURES, THIS 11TH DAY OF JULY, A.D. 1922.

MISSISSIPPI CENTENNIAL EXPOSITION COMPANY, BY LEE M. RUSSELL, CHAIRMAN AND JNO T. CONNELL, EXECUTIVE SECRETARY.

CITY OF GULFPORT, BY CHES. R, HAYDON, MAYOR

PROPERTY DESCRIPTION: (AS PER SURVEY):

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PROPERTY DESCRIPTION. (AS PER SURVEY).

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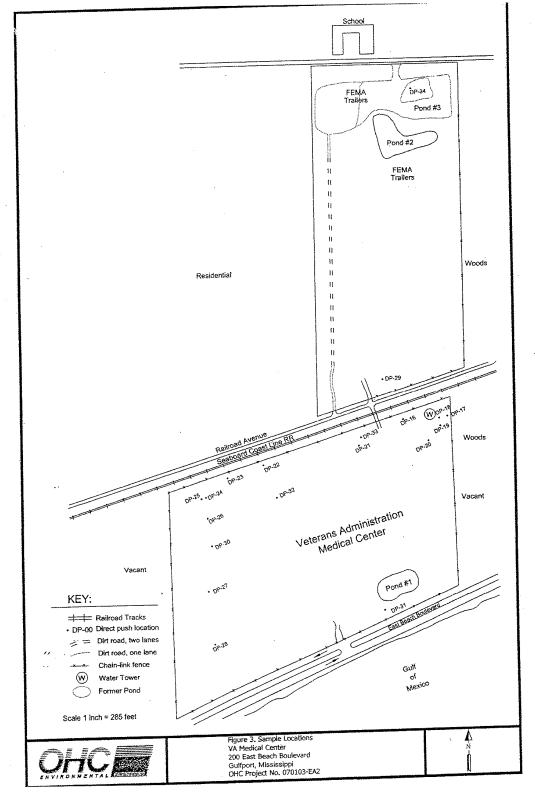




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ATTACHMENT 2

OHC Environmental Engineering Sample Location Map







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ATTACHMENT 3

Site Drawing Boiler Plant Building 245

